

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

DAVID B. POPKIN MOTION NUMBER 1

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Respectfully submitted,

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On January 6, 2012, the United States Postal Service filed an Application for Non-Public Treatment of Library Reference USPS-LR-N2012-1/NP7 ["Application"]. The apparent thrust of their Application is to file under seal the average daily volumes of First-Class Mail carried between specific 3-digit ZIP Code origin and destination pairs and between specific facilities in the Postal Service's processing network.<sup>1</sup>

The Postal Service claims that disclosure of First-Class Mail volumes would allow competitors gain specific insight into local customer behavior, gauge the size of the delivery market, and develop strategies for marketing resources.<sup>2</sup> The Postal Service also claims that a competitor could adjust its product offerings, prices, operations and marketing activities to compete for the volume represented by these data.<sup>3</sup>

The Postal Service's Application relates to filing First-Class Mail volumes under seal but claims that competitors would use this data if it were public. First-Class Mail is a Market Dominant product to which the Postal Service has a monopoly on carriage. The Postal Service does not provide any information or discussion on the relationship that might exist between First-Class Mail volume which would be in the Library Reference and

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<sup>1</sup> Application at 1  
<sup>2</sup> Application at 3  
<sup>3</sup> Application at 4

other mail volumes which a competitor could carry such as the equivalent of Express Mail, Priority Mail, or package services.

The Postal Service also claims that a competitor could gain specific insight into local customer behavior. I don't see how aggregate data between points A and B could provide any insight into any specific customer's mailing levels.

Furthermore any individual who wants to determine the Postal Service's compliance with the requirements of 39 CFR 121.1[a] as it relates to which destination SCFs have a mail volume of at least 1.5 percent of the total annual First-Class Mail volume originating from the origin processing facility so as to qualify for overnight service standards under the present regulations assuming operational and transportation feasibility permit [established in a previous PRC Docket as 3 or less drive hours] would have to be provided with that data.

For the reasons provided, I request that the Non-Public Library Reference be made public.